

# Ex. M-L(b)

Summons and Complaint from  
Pressler & Pressler to Moore

**CONFIDENTIAL INFORMATION**

File # M272168

**CONSUMER CREDIT TRANSACTION**

DISTRICT COURT OF THE COUNTY OF SUFFOLK - FIRST DISTRICT : RONKONKOMA

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MIDLAND FUNDING LLC DBA IN NEW YORK  
AS MIDLAND FUNDING OF DELAWARE LLC  
Plaintiff,

-against-

**Index No.**  
**SUMMONS**

CRAIG MOORE

Defendant(s).

Plaintiff's Residence Address  
8875 AERO DRIVE SUITE 200  
SAN DIEGO CA 92123

The Basis of this venue  
designated is:  
Defendant's residence

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Defendant's Residence Address  
25 CRATER LAKE DR  
CORAM, NY 11727

To the above named defendant(s): YOU ARE HEREBY SUMMONED and required to appear in the District Court of the County of Suffolk, FIRST DISTRICT : RONKONKOMA, at the office of the clerk of the said court at 3105 VETERANS MEMORIAL HIGHWAY RONKONKOMA NY 11779 in the County of SUFFOLK, State of New York, by serving an answer to the annexed complaint upon plaintiff's attorney, at the address stated below, or if there is no attorney, upon the plaintiff at the address stated above, within the time provided by law as noted below;

Upon your failure to answer, judgment will be taken against you for the relief demanded in the complaint together with the costs of this action.

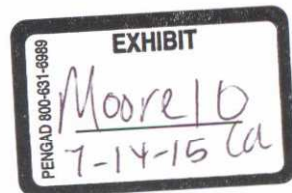
Dated: 06/27/11

PRESSLER and PRESSLER, LLP  
Attorneys for Plaintiff  
By: Mitchell E. Zipkin, Esq.

305 Broadway 9th Floor  
New York, NY 10007  
(516) 222-7929

NOTE: The law or rules of law provide that:

- a) If this summons is served by its delivery to you, or (for a corporation) an agent authorized to receive service, personally within the county of SUFFOLK, you must answer within twenty (20) days after such service; or
- b) If this summons is served by otherwise than as designated in subdivision (a) above, you are allowed thirty days (30) days to answer after the proof of service is filed with the Clerk of this Court.
- c) You are required to file a copy of your answer together with the proof of service with the clerk of the district in which the action is brought within ten (10) days of the service of the answer.



**CONFIDENTIAL INFORMATION**

File # M272168

DISTRICT COURT OF THE COUNTY OF SUFFOLK - FIRST DISTRICT : RONKONKOMA

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MIDLAND FUNDING LLC DBA IN NEW  
YORK AS MIDLAND FUNDING OF  
DELAWARE LLC

Plaintiff(s)  
-against-

Index No.  
COMPLAINT

CRAIG MOORE

Defendant(s)  
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Plaintiff by its attorney, Pressler and Pressler, LLP  
complaining of the defendant(s) respectfully alleges upon  
information and belief as follows:

**FIRST CAUSE OF ACTION**

1. Plaintiff, MIDLAND FUNDING LLC DBA IN NEW YORK AS MIDLAND FUNDING OF DELAWARE LLC, is a limited liability company formed under the laws of the state of DE and having taken assignment of its owner of GE MONEY BANK account number 6008894762841387.
2. Defendant(s) resides within the jurisdictional limits of this court.
3. The defendant(s) entered into a credit card agreement account number 6008894762841387 with GE MONEY BANK wherein defendant(s) agreed to pay GE MONEY BANK all amounts charged to said account by the authorized use thereof.
4. The agreement containing the terms and conditions governing the use of the charge account, including terms of payment was issued to defendant(s).
5. Thereafter defendant(s) incurred charges by use of the said account in the sum of \$504.03 .
6. There is now due and owing the plaintiff , as the assignee of the account from the defendant(s) the agreed sum of \$504.03 .

**SECOND CAUSE OF ACTION**

7. Plaintiff repeats, realleges and reiterates each and every allegation contained in paragraphs 1-6 as if set forth at length.
8. Plaintiff's predecessor in interest mailed monthly statements required by the agreement to the defendant(s) thereby rendering a full just and true account of all unpaid amounts charged by the defendant(s) which are due and owing, and defendant(s) received, accepted and retained same without objection.
9. By reason of the aforementioned, an account stated was taken and had between the plaintiff's predecessor in interest and defendant(s) for the agreed total balance of \$504.03 .

**CONFIDENTIAL INFORMATION**

WHEREFORE, plaintiff demands judgment against defendant(s) on the first cause of action for the sum of \$504.03 together with pre-suit interest from 05/15/11 to 06/23/11 in the amount of \$4.85 for a total sum of \$508.88 together with accruing interest to the date of judgment plus costs and disbursements of this action and for such further and other relief as the Court deems just and proper and on the second cause of action for the sum of \$504.03 together with pre-suit interest from 05/15/11 to 06/23/11 in the amount of \$4.85 for a total sum of \$508.88 together with accruing interest to the date of judgment plus costs and disbursements of this action and for such further and other relief as the Court deems just and proper.

PRESSLER and PRESSLER, LLP  
305 Broadway 9th Floor  
New York, NY 10007  
(516) 222-7929

PRESSLER and PRESSLER, LLP  
Attorneys for Plaintiff

By: \_\_\_\_\_  
Mitchell E. Zipkin, Esq.

THIS COMMUNICATION IS FROM A DEBT COLLECTOR.